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*Attorneys for Defendants,
County of Clark and Victor Zavala*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRIAN BORENSTEIN, an individual,

Plaintiff,

VS.

THE ANIMAL FOUNDATION, a domestic nonprofit corporation; COUNTY OF CLARK, *ex rel.* CLARK COUNTY ANIMAL CONTROL, a political subdivision of the State of Nevada; SUNRISE HOSPITAL AND MEDICAL CENTER, LLC, a foreign limited-liability company domiciled in Delaware; CARLY SCHOLTEN, an individual; VICTOR ZAVALA, an individual; ULRIKE PASTERNAK, an individual; and ROE BUSINESS ENTITIES 1-5; and DOE INDIVIDUALS 1-5.

Defendants,

CASE NO: 2:19-CV-00985-APG-DJA

**STIPULATION AND [PROPOSED]
ORDER FOR DEFENDANTS
COUNTY OF CLARK AND VICTOR
ZAVALA TO FILE REPLY IN
SUPPORT OF MOTION TO DISMISS
PLAINTIFF'S FIRST AMENDED
COMPLAINT**

(FIRST REQUEST)

COMES NOW Defendants, County of Clark and Victor Zavala, by and through their counsel, Jonathan D. Blum, Esq. of Wiley Petersen Law Offices, and Plaintiff, BRIAN BORENSTEIN, by and through his counsel, Raelene K. Palmer, Esq. of The Palmer Law Firm, P.C., and Robert S. Melcic, Esq. and hereby request the Court to extend the deadline for Defendants to respond to [ECF No. 111] *Plaintiff's Opposition to County of Clark and Victor Zavala's Motion to Dismiss the First Amended Complaint* and in support of their Motion to

1 Dismiss [ECF No. 68] by one week from Tuesday, October 20, 2020 to Tuesday, October 27,
2 2020.

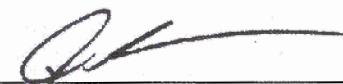
3 This is the first request for an extension. The original deadline was October 20, 2020. The
4 parties submit that this request is made in good faith and not for the purpose for undue delay but
5 is related to unanticipated obligations and calendar deadlines for Defendants' counsel.

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| DATED this <u>16</u> day of October, 2020. | DATED this <u>16</u> day of October, 2020. |
| By: <u>/s/ Robert S. Melcic</u> Robert S. Melcic, Esq. State Bar No. 14923 4930 Mar Vista Way Las Vegas, Nevada 89121 (702)526-4235 robertmelcic@gmail.com Attorney for Plaintiff, Brian Borenstein | By: <u>WILEY PETERSEN</u> Jonathan D. Blum, Esq. State Bar No. 9515 1050 Indigo Drive, Suite 200B Las Vegas, Nevada 89145 (702) 910-3329 jblum@wileypetersenlaw.com Attorneys for Defendants, County of Clark and Victor Zavala |

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19 **ORDER**

20 IT IS SO ORDERED.

21 DATED: October 19, 2020.

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24 ANDREW P. GORDON
25 UNITED STATES DISTRICT JUDGE
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